

REMARKS

The present response is filed with a Request for Continued Examination (RCE), and is to Office Action mailed in the above-referenced case on January 23, 2004, made Final. Claims 1-24 are presented below for examination. Claims 1-24 remain rejected under 35 U.S.C. 103(a) as being unpatentable over Chao et al. (U.S. 6,338,092 B1), hereinafter Chao, in view of Goertzel et al. (U.S. 6,208,952 B1), hereinafter Goertzel. Claims 6, 12, 18 and 24 remain rejected under 35 U.S.C. 103(a) as being unpatentable over Chao in view of Goertzel, and further in view of Gehami et al. (U.S. 5,765,171), hereinafter Gehami.

Applicant has again carefully studied the prior art references provided by the Examiner, and the Examiner's rejections and statements in the instant Office Action. In response, applicant provides further argument that the prior art cited and applied by the Examiner, either singly or combined, does not anticipate or suggest all of the limitations of applicant's claims. Applicant points out and argues the key and patentable limitations of applicant's claims, as supported by the teachings of applicant's specification, which appear to be misunderstood by the Examiner.

Applicant wishes to persuasively demonstrate to the Examiner that the reference of Goertzel relied upon by the Examiner in his rejections of applicant's claims, teaches an alternative invention for solving a problem different from that which is solved by applicant's invention, and the reference therefore has no motivation for teaching or suggesting the key and patentable limitations of applicant's claims.

Specifically, the Examiner has stated in the Response to Arguments section of the instant Office Action that Goertzel teaches or suggests that each of the plurality of processors runs both the first and second protocol (many different

communication protocols... executing on the same computer system) (col. 1 lines 59-62 and col. 4 line 36-col. 5 line 20). Applicant agrees with the Examiner's interpretation of Goertzel in that the reference teaches that all of the processors run multiple protocols. However, this teaches away from applicant's invention, because it is not necessary that all of the processors run the first and second protocols in practice of applicant's claimed system and method.

Goertzel teaches a method and system for delayed registration of a remote protocol for communication between a client computer system and a server computer system, while in contrast, applicant's invention teaches creating a client-server relationship between processors within a single computer system. Applicant's independent claim 19, for example, specifically recites a (single) data packet router comprising a first plurality of processors, each maintaining a copy of a routing table, and the first and second protocol operating on individual ones of the first plurality of processors, the protocols independently generating more amending routing data for the routing table, characterized in that each of the first plurality of processors registers with at least one other of the first plurality of processors, creating client-server pairs, in an arrangement that each of the plurality of processors either runs or is registered with a processor running both the first and second routing protocols.

Applicant wishes to emphasize to the Examiner the internal aspect of applicant's invention, in that applicant's invention teaches a client-server relationship between processors within a single computer system, not between processors distributed over a plurality of systems, as in the teachings of Goertzel. In applicant's invention it is not necessary that all of the processors within the first plurality of processors run both the first and second protocols. However, it is necessary in applicant's invention that one or more of the processors run both protocols. The database that is maintained in each of the first plurality of processors, and amended and updated from both the first and second routing

protocols, is the real-time mapping of the connectivity of the internal system of the data packet router. The distributed processor system within such a scalable router is an essential object of applicant's claimed invention.

The disclosure of Goertzel does not teach creating client-server pairs by registering each of the first plurality of processors with at least one other of the first plurality of processors, such that individual ones of the first plurality of processors, even though many may be only running one protocol, are related in a client-server relationship with at least one other processor in the first plurality of processors running both protocols. Goertzel teaches registering of multiple protocols allowing a server to communicate with various clients over different protocols. Therefore, there is no motivation in the teaching of Goertzel for registering each of the first plurality of processors with at least one other of the first plurality of processors, creating client-server pairs, in an arrangement that each of the first plurality of processors either runs or is registered with a processor running both the first and second protocols, as taught in applicant's invention and specifically recited in applicant's base claims.

The fact that Goertzel teaches programming a computer system (not a single processor) to run many different communication protocols... executing on the same computer system, suggests that the computer system has a single processor, not a first plurality of processors, each running both protocols, or at least registered with another processor of the first plurality of processors running both protocols, as is taught in applicant's invention.

Applicant's invention addresses the problem of independently maintaining a single database, specifically in this case, a routing database, and it is a critical requirement to keep all copies of the routing database consistent because the view of the routing database presented to the routing protocols is vital to correct routing. Moreover, the ability to provide an accurate and timely copy of the forwarding table to a very large number of entities in the system is necessary in

order to leverage the benefits provided by a distributed routing database environment. Applicant's invention provides a system and method for the distribution and synchronization of the routing database and forwarding table to a large number of entities within a distributed processor environment of a scalable router.

Goertzel, in contrast, as recited in the Abstract portion of the reference, teaches a method and system for delayed registration for communicating between a client computer system and a server computer system, and the server computer system has a communication process, which registers a plurality of protocols. The communication process selects a protocol that is supported by both the client computer system and the server computer system and directs the server process to register that protocol.

Applicant argues therefore that it would not have been obvious to utilize multiple protocols in the invention of Chao, as taught by Goertzel, because Goertzel teaches an alternative invention for solving a completely different problem from that which is solved by applicant's invention. Goertzel does not teach creating client-server pairs by registering each of the first plurality of processors with at least one other of the first plurality of processors, such that individual ones of the first plurality of processors, even though many may be only running one protocol, are related in a client-server relationship with at least one other processor in the first plurality of processors running both protocols.

Applicant's independent claims 1, 7, 13 and 19 are therefore clearly and unarguably patentable over the prior art presented by the Examiner, either singly or in combination, as the reference and Chao fails to teach a processor running the first and second protocols, and Goertzel fails to make up the deficiency as argued above.

The Examiner has rejected claims 6, 12, 18 and 24 as being unpatentable over Chao in view of Goertzel, and further in view of Gehami. All of the above

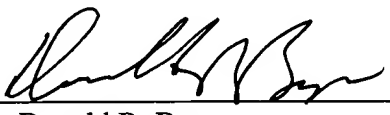
claims are depending claims, and in view of applicant's arguments presented above, all of depending claims 2-6, 8-12, 14-18 and 20-24 are patentable on their own merits, or at least as depended from a patentable claim.

As all of the claims left standing and as amended and argued above are clearly shown to be patentable over the prior art either singly or in combination, applicant respectfully requests that the rejections be withdrawn, and that the case be passed quickly to issue.

If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Respectfully Submitted,

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